

EIGHT CLUB WEBSITE PRIVACY POLICY

INTRODUCTION

Eight Club Limited (“**Eight Club**”) takes your privacy very seriously and treats all your personal data with great care. Eight Club complies with all applicable data protection legislation.

When you visit our website at www.eightclub.co.uk (or subdomains) (the “Website”), contact us, purchase products or services from us or use our services, we collect information from and about you. Some of the information we collect may be classed as personal data, that is, “any information relating to an identified or identifiable natural person”.

This Privacy Policy describes the personal data we may collect and process, and the purpose for which we may do so. It also explains your rights under data protection legislation.

IMPORTANT INFORMATION

Eight Club is operated by Eight Club, which is the data controller and responsible for your personal data collected and otherwise processed in connection with this Policy. Please see below for our registration number. Our registered address is: Hadley Hurst, Hadley Common, Barnet, Herts. We are registered with the Information Commissioner's Office (“**ICO**”), the UK regulator for data protection issues, under registration number 275.

We have appointed a data protection officer (“**DPO**”) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the DPO by email to: privacy@eightclub.co.uk.

PERSONAL DATA DO WE PROCESS?

We collect, use and share the following personal data about you:

Identity Data: This includes your first name, last name, business details if making a corporate booking or dealing with us as a representative of a supplier (such as name of employer, employer’s address and job title), marital status, title, date of birth and other personal details.

Contact Data: This includes your address, email address and telephone numbers;

Financial Data: This includes your bank account and payment card details;

Transaction Data: This includes details about payments you make to us, other details of products and services you have purchased and points accumulated under our loyalty scheme;

Health Data: We may collect information about any past or present health conditions or disabilities and any treatment and services received where you provide this information to us;

Profile Data: This includes purchases or orders made by you, your interests, preferences, feedback and survey responses;

Technical Data: We may collect your personal data through our Website when you visit our Website. We automatically log you out and your computer or mobile device when you access our Website, such as http header information which your browser transmits to our webserver and information collected through the use of cookies and log information. For example, when you visit our Website, we collect your computer or mobile device operating system name and version, manufacturer and model, browser type, browser version, screen resolution, the website you visited before browsing to our Website, pages you viewed, how long you spent on a page, and other technical information about your use of and actions on Website.

Security Data: We operate CCTV systems at our properties. These are in operation and video recordings may be made. This is done for security and service reasons for the better management of Eight Club and security for all its clients and staff.

Marketing Data: This includes your preferences in receiving marketing from us and your communication preferences.

In addition to the personal data (as described above), we do not collect any special category data about you. For your information special category data includes data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, or other genetic data). Nor do we collect any information about criminal convictions and offences (also known as criminal offence data).

we use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered into with you;
- where it is necessary for our Legitimate Interests (or those of a third party) and your interests and fundamental rights do not override ours; or
- where we need to comply with a legal obligation.

“**Legitimate Interests**” means our interests in conducting and managing our business to enable us to give you the best service/product and your best overall experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights in relation to your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by your interests or rights (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we balance our interests against any potential impact on you in respect of specific activities by contacting us.

We do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending you marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by clicking on the link below.

HEALTH DATA

When you provide us with Health Data when ordering food or drinks at one of our facilities, or using the CORE gym facilities, we will process that data. We will process Health Data solely in order to:

- provide you with food that meets any dietary requirements you may notify to us; or
 - enable you to use our facilities (including in particular the CORE gym) safely and in accordance with any medical needs you may notify to us.
- We will not share your Health Data with any third parties without first obtaining your express consent.

USES FOR WHICH WE WILL USE YOUR PERSONAL DATA

Below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we have identified what our legitimate interests are where appropriate.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using it. If you need details about the specific legal ground we are relying on to process your personal data where more than one ground applies, please refer to the table below.

PURPOSE/ACTIVITY	TYPE OF DATA	LEGAL BASIS
To register you as a member	Identity Data Contact Data	Performance of a contract with you
To process and deliver products and services you may order from us, including managing payments and collecting and recovering money owed to us, and to administer our loyalty scheme	Identity Data Contact Data Financial Data Transaction Data Marketing Data	Performance of a contract with you Necessary for our legitimate interests in recovering debts owed to us and promoting our business through our loyalty scheme
To manage our relationship with you, including notifying you of changes to our products and services, terms and conditions and this Privacy Policy, and asking you to leave a review or take a survey	Identity Data Contact Data Profile Data Marketing Data	Performance of a contract with you Necessary for our legitimate interests in keeping our records updated and studying how our customers use our products and services
To assess your ability to use the CORE gym facilities and participate in exercise programs and to assist you in using the gym’s facilities safely and in accordance with any medical needs you may notify to us	Identity Data Health Data	Consent
To provide food choices which respect any dietary requirements	Identity Data	Consent

		relevant, to develop our business and to our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity Data Contact Data Technical Data Profile Data Marketing Data	Necessary for our legitimate interests (to develop our products/services and grow business)

COMMUNICATIONS FROM US

We use Identity, Contact, Technical and Profile Data to form a view on what we think you may want or need, or what may be relevant to you. We decide which products, services and offers may be relevant for you (we call this marketing). You may receive marketing messages from us if you have requested information from us or purchased goods or services from us and you have not opted out.

MARKETING AND ADVERTISING

We will only express opt-in consent before we share your personal data with any third party for marketing purposes.

We allow other companies to serve third-party advertisements when you visit and use the Website. These companies may collect and use information, browser type, time and date, subject of advertisements clicked or scrolled over during your visits to the Website and use this information to serve advertisements about goods and services likely to be of interest to you. These companies typically use tracking technologies for this purpose. Other companies' use of their tracking technologies is subject to their own privacy policies.

We use Personal Data to provide you with personalised offers, both on our Website and via advertisements on other websites you visit. In addition to advertisements that may interest you, we may display targeted advertisements on the Website, or other digital properties we own or control, with our content based on information provided to us by our users and information provided to us by third parties that track your online activities. We do not provide personal data to advertisers when you interact with an advertisement.

¶

You can instruct us or third parties to stop sending you marketing messages at any time by either (i) opting out by using the option we provide in any marketing message (e.g. an email newsletter), or (ii) updating your preferences on your profile on the Website, or (iii) by sending an email to membersclub.co.uk or (iv) writing to: Membership Manager Eight Members Club, 1 Dysart Street, London, EC2A 2BX. Your consent to receive marketing messages this will not apply to personal data provided to us as a result of other interactions with us, and we may use this data for purposes that do not constitute direct marketing, i.e. service messages.

We use various cookies. We may track and record your use of our online services, either through cookies or via other means. Cookies allow us to monitor your browsing behaviour. Information generated by the use of cookies may constitute personal data. We may use this information in this manner for the purposes as stipulated in this Privacy Policy. Please see our Privacy and Cookie Policy for more information.

PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for a purpose that is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will give you the opportunity to object before we allow us to do so.

We may process your personal data without your knowledge or consent, in compliance with the above rules, where this is necessary for legal reasons.

CONTROLLING YOUR DATA

We will process your personal data as follows:

we do not share your data with any third parties outside of the above processing arrangements and we do not share your data with any third party or group for their own marketing purposes. From the data we collect, you should only ever receive marketing communications from us.

INTERNATIONAL DATA TRANSFERS

Where it is necessary to transfer your personal data overseas. Any such transfers will be made in full compliance with all applicable data protection laws.

For our business purposes we use cloud based services. Therefore, for technical and organisational reasons, it is necessary that your data is stored on servers located in countries outside of the UK. When we transfer the data to a country outside of the UK that has not been recognised by the ICO as offering an adequate level of data protection, we will ensure compliance with applicable law by way of implementing appropriate safeguards approved by the ICO, or other legally accepted safeguards, as applicable.

If you require further information regarding international transfers of personal data please contact us.

YOUR RIGHTS

Under applicable data protection laws provide the following rights for individuals:

Right to revoke consent:

If we process personal data on the basis of your consent, you have the legal right to revoke such consent at any time. We will cease all relevant processing activity going forward.

Right of access to your information:

If you want to know what personal data we have collected or process about you, you may request us to provide a copy of your information by sending an email to gdpr@eightmembersclub.co.uk.

Right to rectification and erasure of data, and restriction of processing:

If you believe that our processing of your personal data is incorrect, inaccurate, unlawful, excessive, incomplete, no longer relevant, or you think that your data is stored longer than necessary, you may ask us to change or remove such personal data or restrict its processing, by sending an email to gdpr@eightmembersclub.co.uk.

Right to data portability:

You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format, in accordance with Article 20 of the General Data Protection Regulation.

Right to object:

You have the legal right to object, on grounds relating to your particular personal situation, at any time to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object at any time to our processing of your personal data for direct marketing purposes or to profiling. In some cases, where we have compelling legitimate grounds to process your information which override your rights and freedoms, you may still have the right to object.

Information relevant for all requests and queries

This Privacy Policy is intended to provide you with rights beyond or in addition to your rights as a data subject under applicable data protection law.

We will make reasonable endeavours to respond to your request or query within one month. We are entitled to extend this term by another month if your request is complex. If your request is manifestly unfounded or excessive we may either (i) charge you a fee, or (ii) refuse to process your request. For access requests we may also charge you for extra copies. If we decide not to honour your request or answer your query, we will explain why in our reply.

SECURITY AND STORAGE OF YOUR DATA

We implement appropriate technical and organisational measures to protect your personal data against loss, alteration or any form of unlawful use. Your personal data will be encrypted and stored on a virtual private server that is secured by means of state of the art protection.

nbersclub.co.uk. We hope to resolve any complaint brought to our attention, however if you feel that your complaint has not been resolved, You have the right to make a complaint at any time to the ICO (www.ico.org.uk). We would, however, appreciate if you raise your concerns before you approach the ICO so please contact us in the first instance.

TO THIS POLICY

this Privacy Policy from time to time to make sure it is still up to date. This version was last updated on September 2021